GW - 53

GENERAL CORRESPONDENCE

YEAR(S):

1990-1989

TRANSWESTERN PIPELINE COMPANY

YATES PLANT

SPCC PLAN

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

OCTOBER 1990

GMS & ASSOCIATES

11261 RICHMOND, BLDG. G, SUITE H0, HOUSTON, TEXAS 77082-2617
(800) 366-9817 (713) 497-7815
FAX (713) 497-0202

TABLE OF CONTENTS

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN
Transwestern Pipeline Company
Yates Plant

1.0 INTRODUCTION

The management and personnel of Transwestern Pipeline Company realize and acknowledge the importance of preventing oil from being spilled into the navigable waters of the United States and preventing harmful releases into the environment. The following Spill Prevention, Control and Countermeasure (SPCC) Plan is designed to serve two purposes to help protect the environment.

- First, it provides the procedures which will be used to prevent oil spills and waste releases.
- Second, should a spill or release occur, it describes the protocols for immediate coordination of necessary activities to minimize any harmful effects, including notifications of appropriate government agencies as required under federal regulations.

For the purpose of handling spill responses effectively, this SPCC plan provides: descriptions of the duties performed by facility personnel; procedures to be followed; equipment available; and available outside resources.

This SPCC plan was developed in accordance with the requirements of Title 40 CFR Part 112, and the applicable requirements of the State of New Mexico Oil Conservation Division. This plan conforms to the recommendations of API Bulletin D16, entitled " Suggested Procedures for Development of Spill Prevention, Control and Countermeasure Plans", revised April 1990.

1.1 Management Approval - This SPCC Plan, required under 40 CFR Parts 112, will be implemented as described herein, and is approved by:

_____ Date:_____

Mr. Omer Parker

1.2 Engineering Certification - I hereby certify that I have examined the Transwestern Pipeline Company facility located in Eddy County, New Mexico and being familiar with the provision of 40 CFR 112, attest that the following SPCC plan has been prepared in accordance with good engineering practices and the requirement of 40 CFR parts 112.7; certified by:

Marshall H. Smith, P.E. Date: November 5, 1990

Marshall H. Smith

Texas Registration No. 67391

2.0 GENERAL FACILITY INFORMATION

2.1 Brief Facility Description - This facility is designed to treat natural gas received from a major pipeline and further compress the gas. The design capacity of the compressor station is 10 MMscfd of natural gas. The gas is treated to remove liquids including water, oil and H_2S. Oil and water recovered from the gas is temporarily stored at the facility until removed for recovery by trucks.

Materials which may be stored at the facility include:

- Recovered Pipeline Liquids
- Oily Wastewater
- Used Oil
- Scrubber Liquor
- Lubricating Oils
- Engine Coolant
- Washwater

All storage tanks are above grade vessels constructed on gravel pads. There are no process water streams discharged from this facility into navigable waters. The Yates Plant is located in Eddy County, New Mexico. A facility plot plan is found in Attachment No. 1, which includes an area map for reference.

2.2 Designated Contact - Mr. Omer Parker, is the designated individual for spill prevention and, if a spill occurs, coordination of spill response at the Yates Plant. Correspondence should be addressed to:

Mr. Bill Nolan

Transwestern Pipeline Company

6381 North Main

P.O. Box 2018

Roswell, New Mexico 88202

or

Omer Parker

Transwestern Pipeline Company

2605 West Main

Artesia, New Mexico 88202

Mr. Parker is the Emergency Response Supervisor for this facility. Transwestern will utilize trained personnel and local fire departments to respond to emergency situations. Typically, after an emergency event, e.g. fire, spill or explosion, some form of clean-up is necessary. As in the case of emergency events, Transwestern will rely on trained personnel to conduct the spill clean-up.

2.3 Storage Tanks - Most of the tankage at the Yates facility is constructed of all steel material with welded seams. A waste oil tank which will be replaced is constructed of steel. Additional details concerning the facility tankage and containment systems are found in Attachment No. 2.

a. Pipeline Liquids Tank - This steel walled storage tank has a capacity of 210 barrels. The

liquids placed in this tank are those removed from the pipeline and consist of water and petroleum hydrocarbons which may be contaminated with H_2S. The hydrocarbon phase is removed into trucks and the water phase directed to a surface impoundment where it is temporarily stored prior to being hauled off-site. The tank is constructed on a concrete pad with a two foot tall earthen berm to contain rainwater and spills or drips.

b. Oily Wastewater Pit - This concrete lined pit is used for temporary storage of produced water which is recovered at this facility. Wastewater generated at this facility from washing equipment is also placed in this impoundment. The dimensions of the pit are 40 feet by 40 feet and 8 feet deep. There is an 8 inch tall curb to prevent run-on of precipitation.

c. TGE Storage Tanks (2) - These steel walled storage tanks have a capacity of 90 barrels each. They are used to store an unused mixture of Triethylene glycol and water.

d. DGA Storage Tank - This steel walled tank has a capacity of 90 barrel and is located on a stand approximately 1 foot above grade. It is used to store a premixed solution of diglycolamine.

e. Caustic Storage Tanks (2) - These tanks which have a capacity of 350 barrels each and are currently out of service. They were previously used to store a caustic solution used in the gas cleaning operations conducted at this facility. The tanks will be emptied of all contents and removed in the near future.

f. Oil Storage Tank - This steel walled tank has a capacity of 1,500 gallons. It is used to store unused lubricating oil. It is located on a gravel pad with an 8 inch tall concrete curb to contain rainwater, spills and leaks.

g. Methanol Storage Tank - This steel walled tank has a capacity of 1,000 gallons. It is

used to store unused methanol.

h. Corrosion Inhibitor Storage Tank - This fiberglass walled tank has a capacity of 410 gallons. It is used to store unused corrosion inhibitor(pH controller). It is located on a concrete pad without curbs.

i. Oil Storage Sump This below grade steel walled storage tank has a capacity of 110 gallons. Oil removed from engines, compressors and other rotating equipment is placed into this tank. The oil is loaded onto trucks for recovery off-site. The tank is equipped with a earthen curb at the ground surface to prevent rainwater from entering the tank. This tank is scheduled for removal in the near future.

Table 2.1

Storage Tank Summary

Tank Name	Storage Capacity	Containment Capacity
A. Pipeline Liquids Tank	8,820 gallons	7,920 gallons
B. Oily Wastewater Pit	96,000 gallons	Below grade
C. TGE Storage Tank	3,780 gallons	None
D. DGA Storage Tank	3,780 gallons	None
E. Caustic Storage Tanks(2)	14,700 gal. each	None
F. Oil Storage Tank	1,500 gallons	1,970 gallons
G. Methanol Storage Tank	1,000 gallons	None
H. Corrosion Inhibitor	410 gallons	None
I. Oil Storage Tank	110 gallons	Below grade

2.4 Loading and Pipeline Facilities - There are two (2) loading and unloading areas at the Yates facility. One is for loading and unloading lubricating oils and the other is used for unloading the pipeline liquids. Other tanks are loaded and unloaded directly into or from trucks using flexible hoses.

The facility is part of gas pipeline system used to transport sweet natural gas to mainline compressor stations. Wastewater and recovered liquids which are by-products of the gas compression

operations, are also transported around the facility in above and below grade pipelines. The pipelines used for transporting the products and the wastewater are designed to the same safety and corrosion standards. The gas transmission pipelines are connected to a rectifier system to prevent corrosion of the buried pipes. The location of the pipelines are shown on the facility plot plan included in Attachment 1.

3.0 OIL SPILL EMERGENCY PREVENTION MEASURES

It is recognized that the facility must be maintained and operated to minimize the possibility of a fire, explosion, or any sudden or non-sudden release of oil or hazardous constituents into the air, soil, or surface water, which could threaten human health or the environment. As such, the following preventive measures have been implemented at the Yates facility to minimize the possibility of releases and to minimize their impact should a release occur.

3.1 Security - The entire Yates facility is enclosed by a six foot high hurricane fence with barbed wire across the top. There is only one gate that is kept open during the work periods. The main gate is left unlocked while the facility is staffed, but is locked at the close of each business day.

3.2 Lighting - The operational areas, including facilities with oil and waste storage, of the Yates facility are adequately lit at night, to detect spill or leakage and to conduct spill control activities.

3.3 Spill Containment Devices - The Yates facility will use concrete or earthen dikes to control accidental oil and waste oil releases should they occur. The majority of the significant oil or wastewater storage areas will have dikes constructed in the future to provide secondary containment. These containment systems will be upgraded to comply with the standards established by the State

of New Mexico(OCD). The following storage vessels will be contained within a diked area to sufficiently hold at least 130 percent of the volume of the largest storage vessel or largest group of interconnected vessels within the diked area:

- Pipeline Liquids Tank
- TGE Storage Tanks
- Oil Storage Tank
- DGA Storage Tank
- Methanol Storage Tank

All diked areas used to store oil or oil products will have no outlet piping or valves for drainage. Removal of accumulated liquids from all diked areas can be accomplished by using a portable pump and requires the approval of the supervisor responsible for spill prevention. Drainage will not normally be required and the accululated water will be allowed to evaporate.

3.4 Special Precautions - Waste or flammable materials will not be stored within 50 feet of the property line in accordance with NFPA standards. The corrosion inhibitor tank which is used to store a flammable material will be relocated from its current location which is less than 50 feet from the property boundary. Incompatible materials(if any are present) will be stored in segregated areas. Adequate space shall be provided in and around all areas where oil and wastes are stored to allow the unobstructed movement of personnel and equipment for spill control, emergency response, and for fire fighting needs.

3.5 Inspections - Each of the facility's storage tanks and containment systems will be visually inspected monthly as prescribed by the OCD. Sumps and surface impoundments will be thoroughly inspected annually. The tank inspection will include at a minimum the following:

- o Evidence of leaks or spills
- o Rusted areas on tanks and piping
- o Structural integrity of tank and containment system
- o Breathing vent condition
- o Hoses and associated connections
- o Valving
- o Condition of paint
- o Condition of tank supports
- o Integrity of joints in containment system

The inspectors observations will be recorded on the "Tank Inspection Form" provided in Attachment No. 3. Corrective action for potential problems detected during the inspection will be taken as necessary and will be recorded on inspection forms.

3.6 Personnel Training - All personnel at the Yates facility will receive training in oil spill prevention, safe handling procedures of products and wastes, and methods for recognizing and responding to oil spills and waste releases. This training will cover site-specific information, including implementation of this plan. The training will be conducted annually by personnel trained in oil spill prevention, response, and waste management procedures and having familiarity with the Yates facility. This training will include:

A. Applicable Laws and Regulations
   1. Required spill prevention

2. Waste handling procedures
3. Reporting requirements

B. Safe Response Planning
1. Equipment location
2. Incompatible materials
3. Access space
4. Employee precautions

C. Spill/Release Prevention
1. Secondary Containment devices
2. Containment device maintenance
3. Inspections
4. Operational precautions

D. Spill/Release Control Equipment
1. Proper use and limitations
2. Inspections

E. Oil and Waste Release Response
1. Response to minor releases
2. Response to significant releases

F. OSHA Required Training
1. Personnel protective equipment
2. Decontamination procedures
3. Site safety plan review
4. Emergency response

Training records for facility personnel are maintained in the master file, located at the Transwestern Pipeline Company Roswell facility. In accordance with 40 CFR 112 (10), Transwestern personnel training documentation and employee records are kept in the files at the Yates Plant and the district office. These records include; job titles, job descriptions for each position, description of type and amount of training,and records documenting training or job experience.

4.0 OIL SPILL EMERGENCY RESPONSE PLAN

4.1 Objectives - The intent of this plan is to provide the information needed for the proper response to a spill event. Spill response will vary during each spill event, since each spill is unique. As such, no one plan can specifically address all of the different scenarios that can occur during or after a spill or release of oil or waste at this facility. Generally, the Yates facility could have four types of spill events:

1) Contained Spill - spill inside bermed areas and all material is contained.

2) Controlled Small Spill - spill outside bermed areas but is small enough not to spread off-site.

3) Uncontrolled Spill - that is, a spill of oil or waste oil large enough to exceed bermed capacity (possibly due to rainfall or fire fighting water) or the spill is outside of bermed area, and the spill goes off site.

4) Reportable Spill - the spill leaves the property or the reportable quantity for any material has been exceeded.

There are three main objectives during a spill event. They are:

1. Stop the Source of Leakage,
2. Contain the Leakage and
3. Commence Remedial Action.

The order of priority for the above objectives will vary depending on the events and in what

stage the leak is detected. Tank spills which have breached the containment dike should initially be contained to prevent the oil or wastewater from spreading. For spills associated with fires, remedial action should commence first to prevent the fire from spreading. Consideration should be given to the fact that water used in fire fighting may cause the spill containment systems to overflow. The general plan for oil spill emergency response consists of four steps. They are:

1. The Spill must be reported to the Emergency Response Supervisor (refer to the Phone Numbers in Attachment No. 4).
2. The Emergency Response Supervisor will determine which outside assistance organizations to contact, if any, how to stop the leak, how to contain the leak, and what form of remedial action is necessary, he will then initiate the necessary activities.
3. The Emergency Response Supervisor will notify the OCD and determine which additional government agencies should be notified and ensure that these notifications are made.

4.2 Equipment Location - The equipment available on-site and the location of each item is provided in Attachment No. 5. The location of this equipment is also shown on the facility plot plan provided in Attachment No. 1. Other information which may be useful during an emergency event is provided below:

- o There is a hand held radio available at the facility, which would be useful for communications.

- o The company cars and trucks are equipped with radios which can be used to contact outside assistance.
- o Outside contractors are available to provide personnel and equipment. A listing of local contractors is provided in Attachment No. 6.

4.3 Supervisor Response - After receiving a report of a spill, leak or other emergency the Emergency Response Supervisor shall determine the following:

1. Exact location of spill, leak or other emergency event.
2. Extent of injuries (if any).
3. Whether the event is still occurring and when first observed.
4. The extent of spill, leak or emergency.
5. Methods to safely control the event.
6. If spill containment devices are working.
7. If there are apparent hazards associated with the event.
8. Which outside contractors will be utilized.
9. Present and predicted weather conditions at the facility.
10. Applicable government agency notifications required.

Based on the above information, the Emergency Response Supervisor will implement the most appropriate spill or release response.

4.4 Other Considerations

4.4.1 Drum Leaks - If a leaking drum is detected,the contents remaining in the drum will be transferred to an intact drum if this can be done safely. The empty drum will be put in the empty drum storage area for disposal or reclamation. If the contents cannot be safely transferred to another drum, then the leaking drum will be placed in a DOT-approved overpack drum for off-site disposal. Any spillage and clean up materials will also be placed into an overpack drum for disposal. A label will be placed on the overpack drum, identifying the contents and the original date it was placed in storage.

4.4.2 Evacuation of Site - It is not foreseen that any facility release or event would require evacuation. In the event that evacuation is required, the Emergency Response Supervisor will direct the employees as to the route to take and designate a muster point if appropriate.

4.4.3 Arrangements with Local Authorities - This SPCC Plan contains the information that is most pertinent to outside authorities and response organizations. The Emergency Response Supervisors's office contains additional information which will be provided to police, firefighters, hospitals and other emergency response personnel as needed. This information includes Material Safety Data Sheets for stored products at the facility. Copies of this plan may be provided to outside organizations in the event of a spill event.

5.0 REPORTING

5.1 Spills - When a discharge of diesel, oil or other products leaves the property a REPORTABLE spill has occurred. The Transwestern Emergency Response Supervisor will evaluate the situation to determine if the spill is a reportable spill. If the spill is a reportable spill, the Emergency Response Supervisor will call National Response Center and the New Mexico Oil Conservation District to notify them as soon as possible by phone, according to regulatory requirements. Attachment No. 7 includes the information normally requested by the receiving agency. Whenever the facility has "discharged more than 1,000 gallons off property in a single spill event or discharged harmful quantities, as defined in 40 CFR 110, in two spill events occurring within any twelve month period..." the owner or operator of the facility must file a written report of the incident and include a copy of the facility's SPCC plan (see 40 CFR 112.4 in Attachment No. 8 for details).

In addition, the New Mexico Oil Conservation Division will be notified for any spill or release occuring at the facility.

5.2 Hazardous Materials Releases - If the facility has a fire, explosion or hazardous materials release which could threaten human health or the environment outside the facility, the incident must be reported, following company procedures, to the:

- Local Police and Fire Departments if evacuation is required,
- National Response Center and the New Mexico Oil Conservation Division, and
- Environmental Protection Agency (EPA)

Attachment No. 7 provides the required information for reporting a hazardous waste release to governmental agencies.

5.3 Plan Amendment - In the event this facility has a reportable event, Transwestern Management will review the circumstances causing the event and determine if amendment of this plan is necessary. Every three years the SPCC plan will be reviewed for completeness by Transwestern Management. Further, all future modifications and changes in operations at the Yates facility which materially affect this plan will be incorporated into a revised plan within 6 months after such changes occur.

ATTACHMENT 1
FACILITY DRAWINGS

ATTACHMENT 2
TANK INFORMATION

Storage Tank Summary

Tank Name	Storage Capacity	Containment Capacity
A. Pipeline Liquids Tank	8,820 gallons	7,920 gallons
B. Oily Wastewater Pit	96,000 gallons	Below grade
C. TGE Storage Tank	3,780 gallons	None
D. DGA Storage Tank	3,780 gallons	None
E. Caustic Storage Tanks(2)	14,700 gal. each	None
F. Oil Storage Tank	1,500 gallons	1,970 gallons
G. Methanol Storage Tank	1,000 gallons	None
H. Corrosion Inhibitor	410 gallons	None
I. Oil Storage Tank	110 gallons	Below grade

ATTACHMENT 3
TANK INSPECTION FORMS

TANK INSPECTION FORM

Inspect each tank and containment area for the following:	Y/N	Comments
1. Leaked material from tanks or piping	___	_____
2. Corrosion on tanks	___	_____
3. Corrosion on valves and piping	___	_____
4. Structural damage to tanks or piping	___	_____
5. Water collected in containment area	___	_____
6. Deterioration of containment walls (cracking or corrosion)	___	_____
7. Any unusual odors	___	_____

Tank Name Inspected By Date

ATTACHMENT 4
EMERGENCY RESPONSE SUPERVISORS

ATTACHMENT 5
SPILL RESPONSE EQUIPMENT

Spill Clean-up Kits are provided to allow quick action to respond to a small spill or leak of material. The kits are placed at various locations within the facility as shown in Attachment 1. Each of the kits contains the following equipment:

a. Sealed drum banded to a two wheeled cart
b. Plastic shovel
c. Respirators(2)
d. Goggles(2)
e. 5 gallon pail of absorbent
f. Oil absorbent pillows(3)
g. Roll of Duct tape
h. Neoprene gloves(2 pairs)
i. Rubber boots
j. Coveralls(2 pairs)

In addition to the Spill Cleanup Kits, Transwestern has the following equipment available to respond to larger spills or incidents:

a. Caterpillar Dozer D-5
b. Bantam Backhoe, track mounted
c. Caterpillar Motor Grader
d. Ford Tractor Backhoe - Front End Loader
e. Ford Tractor Front End Loader w/ accessories
f. Caterpillar forklift 8000
g. 16' Utility Trailer
h. 8 ton Ford Truck LTL 9000
i. 40' Flatbed Float
j. Low-Boy Trailer (2)

This equipment is kept and maintained at the district office located at the Roswell compressor station.

ATTACHMENT 6
OUTSIDE RESPONSE ORGANIZATIONS

Organization	Telephone Number
Fire	911
Police	911
Ambulance	911
Eddy County Sheriff	(505) 746-2704
Artesia General Hospital	(505) 748-3333
Waste Management of Southeast New Mexico	(505) 734-6140

ATTACHMENT 7
REPORTING INFORMATION

VERBAL OIL SPILL REPORTS

The Emergency Response Supervisor will be responsible for seeing that all necessary notifications to governmental agencies are made. The following information is expected in a telephone report of an oil spill:

1. Name and telephone number of person reporting spill.
2. Date, location, and time of spill.
3. Has spill been contained and/or stopped.
4. Where known, the name, address and telephone number of the party responsible for the oil spill. If the facility is responsible for the spill, then provide the following:

Transwestern Pipeline Company
Yates Plant
2605 West Main
Artesia, New Mexico
Eddy County

5. Location of discharge.
6. Material(s) spilled and quantity lost.
7. What type of clean-up is underway.
8. Personnel injuries and/or fires associated with spill.
9. Fishkill or other environmental damage associated with spill.

NOTE: A written report and a copy of this SPCC plan must be submitted to the EPA within 60 days of spill if more than 1,000 gallons of oil is spilled.

ENRON
Gas Pipeline Operating Company
WESTERN REGIONAL OFFICE
P. O. Box 2018 • Roswell, New Mexico 88201 • (505) 623-2761

December 20, 1990

Mr. Roger Anderson
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

As set forth in the permit requirements for Discharge Plan GW-53, Yates Plant, enclosed please find the 1990 annual inspection to be visually conducted on all sumps for this facility.

If you require any additional information, contact me at (505) 623-2761 ext. 222.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Bill Nolan
Omer Parker

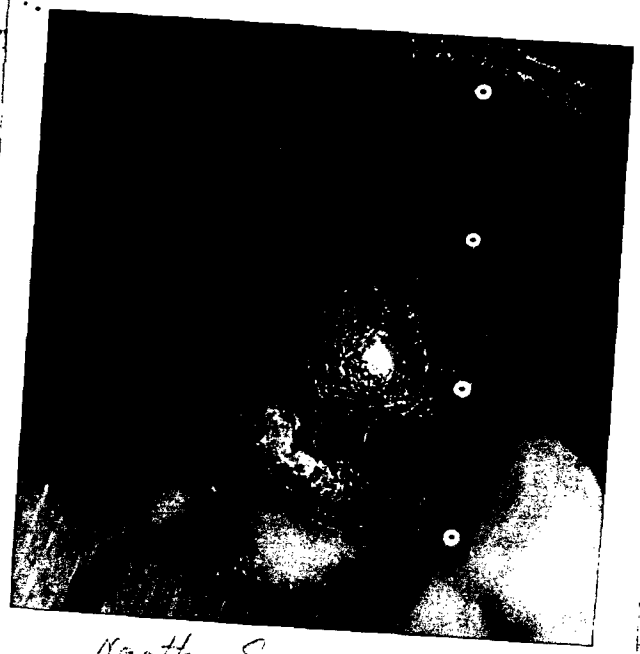
YATES PLANT SUMP INSPECTION

On October 4, 1990, the two sumps at Yates Plant were cleaned and inspected, to see if there were any cracks or defects. Everything was found to be satisfactory. This was requested by the O C D audit. Ed Forlines, mechanic at Yates Plant, and Omer Parker, area O&M supervisor, conducted the inspection. See the attached photographs.

Omer Parker

Omer Parker

O&M supervisor



North Swamp

South Swamp

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

November 9, 1990

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-432

Mr. W. Alan Bowman
Enron Gas Pipeline
Operating Company
P. O. Box 1188
Houston, Texas 77251-1188

RE: Discharge Plan GW-53
Yates Plant
Chaves County, New Mexico

Dear Mr. Bowman:

The ground water discharge plan renewal (GW-53) for the Enron Gas Pipeline Operating Company Yates Compressor Station located in the SW/4, Section 35, Township 18 South, Range 25 East, NMPM, Chaves County, New Mexico is hereby approved.

The approval discharge plan consists of the plan dated April 9, 1990 and the materials dated September 26, 1990, submitted as supplements to the discharge plan.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.A., please note Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

There will be no routine or reporting requirements other than those specified in the discharge plan.

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."

Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3019.G.4., this plan approval is for a period of five (5) years. This approval will expire November 9, 1995 and you should submit an application for renewal in ample time before that date. It should be noted that all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of an underground drainage testing program as a requirement for discharge plan renewal.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

WILLIAM J. LeMAY
Director

WJL/RCA/sl

cc: OCD Artesia Office

ENRON
Gas Pipeline Operating Company
WESTERN REGIONAL OFFICE
P. O. Box 2018 • Roswell, New Mexico 88201 • (505) 623-2769

October 31, 1990

New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Attention: Mr. Roger Anderson
Environmental Engineer

Re: Transwestern Pipeline Company
Discharge Plan GW-53
Yates Plant, Eddy County, New Mexico

Dear Mr. Anderson:

This is our response to the Oil Conservation Division (OCD) comments and requests of May 7, 1990, for additional information concerning the above referenced discharge plan application. This response will correspond to each item identified as per your letter:

1. The Spill Prevention, Control, and Countermeasure (SPCC) Plan is enclosed.

2. Berming of above ground tanks will be completed by June, 1992.

3. A visual internal inspection of existing sumps will be conducted annually, beginning in December, 1990.

4. The underground waste oil tank will be removed by December, 1990, and replaced with an above ground tank.

5. Remove and submit formal closure of the concrete surface impoundment by June, 1992.

6. Concrete berming of the drum storage area will be completed by December, 1990.

As our timetable for discharge plan extension expires on November 8, 1990, we would appreciate your attention in this matter. If you may require any additional information, please contact me at 623-2761 ext. 222.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Terry Doyle
Rich Jolly
Jim Alexandar
Akhtar Alvi

AFFIDAVIT OF PUBLICATION

County of Chaves
State of New Mexico,

I, Jean M. Pettit

Manager,

Of the Roswell Daily Record, a daily newspaper published at Roswell, New Mexico, do solemnly swear that the clipping hereto attached was published once a week in the regular and entire issue of said paper and not in a supplement thereof for a period

of one time

..... weeks

beginning with the issue dated 8th

October, 1990

and ending with the issue dated 8th

October, 1990

Jean M. Pettit
Manager

Sworn and subscribed to before me

this 8th day of

October, 1990

Marylon S. Hughes
Notary Public

My commission expires

July 21, 1994
(Seal)

Publish October 8, 1990

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERAL AND
NATURAL RESOURCES
DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application and a renewal application have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-38) - New Mexico State University, Benjamin E. Woods, Director, Physical Plant Department, Box 30001, Department 3545, Las Cruces, New Mexico, 88003-001, has submitted an application for renewal of its previously approved discharge plan to discharge cooled geothermal water to an unlined pit at its greenhouse facility located in Section 23, Township 23 South, Range 2 East, NMPM, Dona Ana County, New Mexico. Approximately 54,720 gallons per day of cooled geothermal water with a total dissolved solids concentration of 1775 mg/l will be discharged. The disposed geothermal water will percolate into the ground and will reenter the geothermal reservoir. Uppermost ground water is geothermal and is found at 385 feet with a total dissolved solids concentration of 1636 mg/l. The discharge plan address how spills, leaks and other discharges to the surface will be managed.

(GW-52) - Enron Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 7251-1188, has submitted a discharge plan application for its Roswell Compressor station located in the SW/4 SW/4 Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico. Approximately 1000 gallons per day of wastewater will be transferred to an off site livestock watering tank. The wastewater has a total dissolved solids concentration of 1250 mg/l. Ground water most likely to be affected by an discharge to the surface at the facility or the location of the stock tank is at a depth of 240 feet with a total dissolved solids concentration of 1551 mg/l. The discharge plan addresses how spills, leaks and other discharges to the surface will be managed.

(GW-53) - Enron Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 77251-1188, has submitted a discharge plan application for its Yates Plant located in the SW/4, Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. Approximately 1000 gallons per day of produced water is disposed of in a concrete surface impoundment for evaporation. The wastewater has a total dissolved solids concentration of approximately 1250 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 120 feet with a total dissolved solids concentration from 794 to 875 mg/l. The discharge plan addresses how spills, leaks and other discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 2nd day of October, 1990. To be published on or before October 10, 1990.

STATE OF NEW MEXICO OIL
CONSERVATION DIVISON
WILLIAM J. LEMAY
Director

SEAL

scored on a fourth-ter, 14-yard run. Smith's age was the most by a Dallas running back since Hers- Walker gained 134 yards ist Cleveland on Dec.

allas (2-3) staged a ard drive early in the h period that was sparked ommie Agee's run on a ard screen pass ... any Testaverde, the NFL's ... proficient passer n't bring back the Bucs, who had won three ...

olphins 20, Jets 16

Miami, Mark Duper ht second-half touch- passes of 69 and 13 s, getting the winning with 63 seconds left. The hins (4-1) had trailed 13-0 lftime and are off to their start since 1985, the last they made the playoffs. took four third-down con- ons on passes by Dan no in the 80-yard drive that ended with Duper's 8-yard TD. Duper's touchdowns were the former Pro Bowl receiver's first in a year.

Bills 38, Raiders 24

At Orchard Park, N.Y., the Buffalo Bills returned a blocked kick for a touchdown in the fourth quarter for the second straight week, highlighting a 24-point rally for a 38-24 victory over the previously unbeaten Los Angeles Raiders on Sunday night.

The Bills scoring three more points against Los Angeles than the Raiders had allowed all season were down 24-14 before James Lofton caught a 42-yard touchdown pass from Jim Kelly with 8:37 to go. That began a run of 24 points in 5:03.

Buffalo forced a punt and Steve Tasker came through untouched to block Jeff Gossett's punt from the Raiders 46. James Williams scooped up the ball on one bounce and ran 38 yards for the go-ahead touchdown with 6:52 left.

ports in brief

ttipaldi outduels Mears

NAZARETH, Pa. (AP) — Emerson Fittipaldi outdueled ck Mears for victory Sunday in the Bosch Spark Plug and Prix, a race that saw Al Unser Jr. win his first CART G Cup championship despite crashing hard midway rough the 200-lap event at Pennsylvania International iceway.

Unser, 28, was taken to a hospital in Easton, Pa., for a ecautionary CAT scan on his head after he walked away om a three-car crash with what CART doctors called a mild ncussion.

Unser, a second-generation Indy-car star, had only to finish sixth or better Sunday to clinch the $400,000 season ampionship, but he still won the title with one race naining when Michael Andretti, the only driver with a ance of catching him, fought handling problems and und up fifth.

HS wins, meets RHS

Goddard High and Roswell High meet on the soccer field DeBremond Stadium at 6 p.m. Tuesday.

Goddard is coming off a 3-1 win over Carlsbad Saturday

Legal Notices

Publish October 8, 1990

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERAL AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application and ... application have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-...) New Mexico State University, Benjamin E. Woods, Director, Physical Plant Department, Box 30001, Department 3545, Las Cruces, New Mexico 88003 001, has submitted an application for renewal of its previously approved discharge plan to discharge cooled geothermal water to a lined pit at its greenhouse facility located in Section 23, Township ... South, Range 2 East, NMPM, Dona Ana County, New Mexico. Approximately 54,720 gallons per day of cooled geothermal water with a total dissolved solids concentration of 1775 mg/l will be discharged. The disposed geothermal water will percolate ... the ground ... reenter the geothermal reservoir. Uppermost ground water ... thermal and is found at 365 feet with a total dissolved solids concentration of 1636 mg/l. The discharge plan address how spills, leaks and discharges to the surface will be managed.

(GW-...) ... Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 77251-1188, has submitted a discharge plan application for its Roswell Compressor station located in the SW/4 SW/4 Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico. Approximately 1000 gallons per day of wastewater will be transferred to an off site livestock watering ... The wastewater has a total dissolved solids concentration of ... mg/l. Ground water most likely to be affected by an discharge to the surface at the facility or the location of the stock tank is at a depth of ... feet with a total dissolved solids concentration of 1551 mg/l. The discharge plan addresses how spills, leaks and other discharges to the surface will be managed.

(GW-...) ... Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 77251-1188, has submitted a discharge plan application for its Yates Plant located in the SW/4 ... Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. Approximately 1000 gallons per day of produced water is disposed of in a concrete surface impoundment for evaporation. The wastewater has a total dissolved solids concentration of approximately 1250 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 120 feet with a total dissolved solids concentration from 794 to 875 mg/l. The discharge plan addresses how spills, leaks and other discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN Under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 2nd day of October, 1990. To be published on or before October 10, 1990.

STATE OF NEW MEXICO OIL CONSERVATION DIVISON
William J. Lemay
WILLIAM J. LEMAY,
Director

Publish October 8, 15, 1990

FIFTH JUDICIAL DISTRICT
COURT COUNTY OF CHAVES
STATE OF NEW MEXICO

Publish October 1, 8, 15, 22, 1990

FIFTH JUDICIAL DISTRICT
COURT COUNTY OF CHAVES
STATE OF NEW MEXICO
No. CV-90-299

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application and a renewal application have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-38) - New Mexico State University, Benjamin E. Woods, Director, Physical Plant Department, Box 30001, Department 3545, Las Cruces, New Mexico, 88003-001, has submitted an application for renewal of its previously approved discharge plan to discharge cooled geothermal water to an unlined pit at its greenhouse facility located in Section 23, Township 23 South, Range 2 East, NMPM, Dona Ana County, New Mexico. Approximately 54,720 gallons per day of cooled geothermal water with a total dissolved solids concentration of 1775 mg/l will be discharged. The disposed geothermal water will percolate into the ground and will reenter the geothermal reservoir. Uppermost ground water is geothermal and is found at 365 feet with a total dissolved solids concentration of 1636 mg/l. The discharge plan address how spills, leaks and other discharges to the surface will be managed.

(GW-52) - Enron Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 7251-1188, has submitted a discharge plan application for its Roswell Compressor station located in the SW/4 SW/4, Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico. Approximately 1000 gallons per day of wastewater will be transferred to an offsite livestock watering tank. The wastewater has a total dissolved solids concentration of 1250 mg/l. Ground water most likely to be affected by an discharge to the surface at the facility or the location of the stock tank is at a depth of 240 feet with a total dissolved solids concentration of 1551 mg.l The discharge plan addresses how spills, leaks and other discharges to the surface will be managed.

(GW-53) - Enron Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 77251-1188, has submitted a discharge plan application for its Yates Plant located in the SW/4, Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. Approximately 1000 gallons per day of produced water is disposed of in a concrete surface impoundment for evaporation. The wastewater has a total dissolved solids concentration of approximately 1250 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 120 feet with a total dissolved solids concentration from 794 to 875 mg/l. The discharge plan addresses how spills, leaks and other discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant pubic interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 2nd day of October, 1990. To be published on or before October 10, 1990.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

S E A L

ENRON
Gas Pipeline Operating Company
WESTERN REGIONAL OFFICE
P. O. Box 2018 • Roswell, New Mexico 88201 • (505) 623-2761

September 26, 1990

Mr. Roger Anderson
Oil Conservation Division
P.O. Box 2088
Land Office Bldg.
Santa Fe, New Mexico 87504-20880

Dear Mr. Anderson:

As per your request requiring additional information to be submitted for Discharge Plan GW-53 Application, enclosed please find relevant information pertaining to water quality and hydrology of adjacent wells near the Yates Plant.

I hope this information meets with your approval.

If you may any additional information, please contact me at 623-2761, ext. 222.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Terry Doyle

Yates Plant, T18S,R25E,Section 25, SW 1/4, SW 1/4

OCD regulation
Section IV Site Characteristics

A. Hydrologic Features

1. Bodies of water, streams, ...

Name	Type	Location	Use
Rio Penasco	Intermittent	0.5 mile North	Pecos tributary
gravel pit/mine shaft		1 mile SW	
	pond	18.25.25.24 (0.75miles)	
	18 wells	18.25.25 (0.1 to 1 mile)	
windmill	well	18.25.26.23 (.75 miles)	
	well	18.25.26.12 (1.0 mile)	
	well	18.25.24.32 (1.2 miles)	
	well	18.25.23 (>1.0 mile)	
	well	18.25.36.22 (0.5 miles)	
	well	18.25.36.11 (0.25 miles)	
	well	18.25.35.13 (1.0 mile)	
windmill	well	18.26.30 (1.3 miles)	
	2 wells	18.26.30.32 (1.0 mile)	
	well	18.26.30.33 (0.75 miles)	
	no wells	18.26.31	
gardner bros. drilling, well		18.26.30.241 (1.75 miles)	

2. Depth to water and TDS of water.

Artesian Aquifer:
Depth to water (1975) 155 ft.
Depth to top of Aquifer 420 ft.
Thickness of confining bed 300 ft.

Alluvial Aquifer:
Depth to water (1975) 120 ft.
Saturated thickness 50 ft.

Chloride concentration (1978)
Artesian Aquifer 15 mg/l
Alluvial Aquifer 30 mg/l

9 miles north of site 1962 city of Artesia well
Artesian and Aluvial aquifer
TDS = 794 to 875 mg/l
15 miles northwest of site 1962 city of Hope well
Artesian aquifer
TDS = 667 mg/l

3. General direction of ground-water flow

Ground water flows east to southeast for the artesian aquifer (Welder, 1975).

Ground water flows east to southeast in the shallow alluvial aquifer except along the Rio Penasco where water level declines have created a cone of depression, drawing flow to the north.

B. Geologic Description of Discharge Site

1. Soil Type, Reagan Series (RA, RE) loam and light clay loam with a permeability of 0.8-2.5 inches per hour. (DP) Gravelly loam with a permeability of 0.8 to 10 inches per hour. Gypsum or soft caliche at 40 inches in depth.

2. Aquifer Name(s):
A) Shallow Alluvial Aquifer
B) Artesian Aquifer

3. Composition
A) Alluvium
B) San Andreas Limestone (Psa) Queen & Greyburg Fms (Pqgb)

4. Alluvium is about 170 feet thick beneath site. Top of artesian aquifer estimated to be 420 feet.

TABLE 11

CHEMICAL ANALYSES OF GROUND WATER FROM MUNICIPAL WELLS IN EDDY COUNTY, N. MEX.

(Analyses by U.S. Geological Survey. Chemical constituents are in parts per million.)

EXPLANATION:

Location number: All locations are south of the New Mexico Base Line (see p. 4).
Stratigraphic unit: Pc, Capitan Limestone; Qal, alluvium; Psa, San Andres Limestone.
Dissolved solids: Determined from residue after evaporation.

Location number	Owner	Principal water-bearing formation	Date collected	Temperature (°F)	Silica (SiO_2)	Iron (Fe)	Calcium (Ca)	Magnesium (Mg)	Sodium (Na)	Potassium (K)	Bicarbonate (HCO_3)	Carbonate (CO_3)	Sulfate (SO_4)	Chloride (Cl)	Fluoride (F)	Nitrate (NO_3)	Dissolved solids	Hardness as $CaCO_3$: Calcium, magnesium	Hardness as $CaCO_3$: Noncarbonate	Percent sodium	Sodium adsorption ratio (SAR)	Specific conductance (micromhos at 25°C)	pH	Remarks
17.23.30.120	Hope Water Cooperative	Psa	3- 8-62	-	14	0.01	148	32	13		241	0	288	16	0.6	8.1	667	500	302	5	0.3	928	7.4	Public supply.
17.26.17.233	City of Artesia	do.	3- 8-62	74	14	.00	188	44	9.4		230	0	435	16	1.0	2.2	875	648	460	3	.2	1,130	7.3	Do.
18.433	do.	Qal	3- 8-62	67	24	.00	162	37	22		206	0	378	22	.5	11	794	556	387	8	.4	1,050	7.5	Public supply, well at 20th and Hermosa Sts.
23.28. 3.232	John Majors	Pc	1-30-62	70	14	.08	122	41	67		267	0	242	102	.5	4.5	773	474	255	24	1.3	1,140	7.3	Public supply for Happy Valley.
23.25. 1.330	City of Carlsbad	do.	1-31-62	-	13	.10	80	20	5.0	1.6	262	0	36	24	.3	5.1	336	283	68	4	.1	545	7.3	New well 1.
23.26.25.400	Village of Loving	Qal	1-18-62	-	19	.04	96	28	14		274	0	112	20	.5	16	472	354	130	8	.3	703	7.2	Composite sample from four public-supply wells.
24.25.34.221	White City, Inc.	Pc	1-18-62	-	12	.03	76	24	9.0	.9	250	0	88	11	.5	5.5	352	288	76	6	.2	558	7.4	Public supply.

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

August 9, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-305

Mr. W. Alan Bowman
Enron Gas Pipeline
Operating Company
P. O. Box 1188
Houston, Texas 77251-1188

RE: Discharge Plan GW-53, Yates Plant
Chaves County, New Mexico

Dear Mr. Bowman:

The Oil Conservation Division (OCD) has received your request, dated July 25, 1990, for a 90 day extension to November 8, 1990 to discharge without an approved discharge plan.

Based on the information contained in your request, and for good cause shown, an extension to November 8, 1990 to discharge without an approved discharge plan is hereby approved. This extension will allow ENRON to complete and submit a comprehensive SPCC plan.

If you have any questions, please do not hesitate to call Roger Anderson at (505) 827-5884.

Sincerely,

William J. LeMay by David Catanach

William J. LeMay, Director

WJL/RCA/sl

cc: OCD Artesia District Office

ENRON
Gas Pipeline Operating Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

July 25, 1990

New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe NM 87501

Attn: Mr. Roger Anderson
Environmental Engineer

Dear Mr. Anderson:

Discharge Plan GW-53 Application
Yates Plant
Transwestern Pipeline Company

On behalf of Transwestern Pipeline Company, we request an extension of 90 days, or until November 8, 1990, to discharge without an approved discharge plan. Our response to your letter of May 2, 1990, has been delayed while we prepare the SPCC Plan; this explains our need for an extension.

If you require additional information or clarification, please contact me at (713) 853-7303.

Sincerely,

W. Alan Bowman

W. Alan Bowman, PhD, CEP
Project Environmentalist
Environmental Affairs Department

cc Kevin McGlynn
Richard Jolly
Larry Campbell

AND0725wab

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

May 2, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-237

Mr. W. Alan Bowman
Enron Gas Pipeline
Operating Company
P. O. Box 1188
Houston, Texas 77251-1188

RE: Discharge Plan GW-53
Yates Plant
Eddy County, New Mexico

Dear Mr. Bowman:

The Oil Conservation Division (OCD) has received and is in the process of reviewing the above referenced discharge plan application. The plan submittal, dated April 9, 1990, was received by the OCD on April 10, 1990. The following comments and requests for additional information are based on our review of the data provided in the plan and on OCD's site visit of November 28, 1989:

1. In the application you state procedures for spill containment and cleanup will be included in a SPCC plan that is in preparation. When will this document be completed and furnished to the OCD?

2. The OCD is requiring that above grade tanks that contain materials with constituents that can be harmful to fresh water and the environment, if a sudden and catastrophic spill were to occur, to be bermed so that the spill is contained at the site and mitigated immediately. Containment in a small area of at the tank site allows for maximum recovery of fluids and small volumes of contaminants available for infiltration. Without berming the rupture of a tank will spread its contents over a large area minimizing the amount that can be recovered and increasing the surface area of contaminated soil available to leach contaminants. All tanks that contain these types of materials must be bermed to prevent migration of the fluids and decrease the potential for infiltration. The bermed areas shall be large enough to hold one-third more than the volume of the largest vessel or one-third larger than the total volume of all interconnected vessels contained within the berm. In addition, all above ground saddle tanks, such as your diesel tank, should be mounted on a pad with curbing. Please submit a plan with a completion timetable for berming and/or paving and curbing these tanks.

3. None of the sumps at the facility were constructed with leak detection. If it OCD's policy that all below grade facilities now in service that do not have leak detection are required to be visually inspected yearly to insure integrity. A commitment to incorporate leak detection in the design and construction of any replacement or newly constructed facilities is also required.

4. The underground tank east of the compressor building that contains used engine oil is not equipped with leak detection. Submit a program for annual integrity testing of this tank. When this tank is removed for repair or replacement, leak detection will be required prior to reinstallation.

5. The concrete surface impoundment is not equipped with leak detection. To verify the integrity of this facility, a commitment to annually empty, clean, visually inspect and perform any needed repairs is required.

6. The drum storage west of the pump room showed evidence of spills and leaks. Submit a plan and completion timetable for the paving and curbing of all drum storage areas.

If you have any questions, please do not hesitate to call me at (505) 827-5884.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/sl

cc: OCD Artesia District Office

ENRON
Gas Pipeline Operating Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

April 9, 1990

New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501

Attn: Mr. Roger Anderson
Environmental Engineer

Dear Mr. Anderson:

Discharge Plan GW-53 Application
Yates Plant
Transwestern Pipeline Company

This Discharge Plan Application for Yates Plant, located in Eddy County, New Mexico, is being submitted on behalf of Transwestern Pipeline Company. If you require additional information or clarification, please contact me at (713) 853-7303.

I. GENERAL INFORMATION

A. Discharger/Legally Responsible Party

Name: Transwestern Pipeline Company
Yates Plant
Attn: Omar Parker

Address: 2605 W. Main St., Artesia NM 88210

Telephone: (505) 457-2568

B. Local Representative or Contact Person

Same as above.

C. Location of Discharge

Legal Description: Southwest 1/4 Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico.

A USGS 7.5 minute quadrangle map and a plot plan showing location of discharge, plant equipment, and other site information required below, are attached.

Note: All onsite routine discharges are to sumps, above-ground tanks, or a concrete-lined surface impoundment, with subsequent transfer offsite by an appropriate disposal company. No onsite discharges are intentionally allowed to enter surface waters or groundwaters.

D. Type of Natural Gas Operation

This plant treats up to 7 MMscfd of natural gas from fields in southeastern New Mexico, removing pipeline liquids and H_2S, and provides compression for transportation in the Transwestern system. Plans call for increasing plant throughput to 10 MMscfd.

E. Copies

Three copies of the discharge plan application are enclosed.

F. Affirmation

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate, and complete to the best of my knowledge and belief.

Sincerely,

W. Alan Bowman

W. Alan Bowman
Project Environmentalist
Environmental Affairs Department

3 Copies

cc Bill Janacek, w/o USGS maps
Omar Parker, w/o USGS maps
Richard Jolly w/o USGS maps
Larry Campbell w/o USGS maps

OCD0328wab

II. PLANT FACILITIES

A. Sources and Quantities of Effluent and Plant Fluids
For each source, primary quality type (e.g., high TDS water, hydrocarbons, sewage), estimated quantities, and major additives, if any, are provided.

1. Processors: An inlet scrubber on each compressor removes a total of 10,900 barrels per year of pipeline liquids from the gas. These liquids are temporarily stored in an above-ground 210 barrel capacity pipeline liquids tank. The hydrocarbon phase of the liquid is removed periodically by Yates Petroleum Company and marketed, while the water is directed to a surface impoundment, where it evaporates. H_2S emissions from the tank vent are directed to a flare.

   A triethylene-glycol (teg) dehydrator removes water from the gas; the water in the form of water vapor is vented to the atmosphere. A teg reboiler is part of the system; no additives are used.

   A diglycolamine (dga) plant removes H_2S from the gas and directs it to a flare. A dga reboiler is part of the system; no additives are used.

2. Boilers: Not applicable.

3. Engine cooling water: A Waukesha Model 7042 and a Waukesha Model 2895, both 4-cycle internal combustion engines, drive compressors at the plant. The engines have separate closed-loop radiator systems, circulating a pre-mixed solution of Ambitrol glycol and water; no additives are used.

   Two small Ingersol Rand air compressors, which provide instrument air to the control room, have similar closed-loop radiator systems (i.e., use pre-mixed coolants, no additives).

   Any coolant removed for engine or compressor maintenance is stored and returned to the units. In the event that the coolant is changed out, the waste material will be removed from the site by an approved disposal company.

4. Cooling tower: Not applicable.

5. Sewage: Sewage is directed to an onsite septic tank and associated leach field. Until 1982, a sink drain from an onsite analytical laboratory, used to test glycol and amine, was also directed to the septic tank. As the laboratory is no longer in service, the septic system is now completely separate from other plant effluents, with no commingling.

6. Other: There are no cleaning operations using solvents, no truck washing, and no pesticides used at this plant. Rags and Alpha Blue Tiger soap are used for cleaning. Weeds are controlled by periodic spraying of herbicides by a third party - A-1 Weed Control Company, Hobbs, New Mexico.

   Floor drains are discussed in Section II.B.6.

   Materials stored and used onsite include: Citgo NGL oil, Marvel Mystery Oil, Mobil pump oil, methanol, pre-mixed Dow Ambitrol FL glycol and water, triethylene-glycol, diesel fuel, pre-mixed diglycolamine and water, Alpha Blue Tiger soap, and Kontrol 430W corrosion inhibitor.

B. Quality Characteristics

Characteristics of the individual waste streams are as follows.

1. Processors: Pipeline liquids are received at the plant as part of the gas stream. The hydrocarbon phase is a marketed product. The water phase is produced water; it may contain suspended solids, but it is exempt from hazardous waste regulations.

   Dga reboiler in the H_2S removal system contains diglycolamine and water. Chemical analysis is unavailable.

   Teg reboiler in the dehydration system contains triethylene-glycol and water. Chemical analysis is unavailable.

2. Boilers: Not applicable.

3. Engine cooling water: Coolant consists of a pre-mixed solution of Ambitrol glycol and water. Chemical analysis is unavailable.

4. Cooling tower: Not applicable.

5. Sewage: Not applicable.

6. Other: Herbicide used is "Krozar I"; it is administered by a contractor, and is not stored onsite.

   Used engine oil is temporarily stored onsite. It is routinely analysed for the purpose of determining when it needs to be changed out; a typical analysis is attached.

   A floor drain in one engine room (Waukesha 2895) collects oily waste water when oil is washed from the engine and compressor, and directs it to the surface impoundment. The other engine/compressor is skid-mounted an rests on a gravel pad; there is no drain.

Drain pipes in the amine plant pump room direct dga pump leakage to an outdoor sump south of the pump room. The liquid is directed back into the amine system - a closed-loop system. Pumps all have electric drivers, so there is no engine oil or coolant involved. Sump has a steel lid to prevent rainwater intrusion.

Other plant drains including those in the dehydration system area collect oily waste water and used teg, which are directed to an outdoor sump on the north side of the pump room, and from there it is directed to the surface impoundment where the water evaporates. Sump has a steel lid to prevent rainwater intrusion.

C. Transfer and Storage of Plant Fluids and Effluents

1. Water and wastewater flow schematics are not applicable because no individual water treatment units exist. Liquid wastes are not discharged onsite; they are stored temporarily and then transferred offsite.

2. Potential water contaminants, which may be discharged to the surface and subsurface within the plant, would be associated with sumps, above-ground storage tanks, the surface impoundment, and connecting underground pipes. Sumps, storage tanks and surface impoundment are inspected weekly. Tanks are mounted above-ground on steel I-beams or stands to facilitate inspection. There is no record of leaks; however, there is evidence onsite of minor spills, i.e., stained soil. At the present time, only two storage tanks are bermed or curbed, but plans call for berming all of them. Storage tanks, surface impoundment, and sumps consist of:

   a. Pipeline liquids tank - 210 barrel capacity, steel-walled; 2' earthen berm; contains pipeline liquids from inlet scrubbers; hydrocarbon phase is removed from site by Yates Petroleum Company; water phase is drained to surface impoundment, where it evaporates.

   b. Surface impoundment - 40 feet by 40 feet by 8-feet deep, concrete-lined; edge is about 8" above grade to prevent runon; contains liquids from sumps and water from the pipeline liquids tank; liquid is removed by Enron Oil Trading and Transportation Company (EOTT) as necessary to prevent overflowing. Impoundment is screened to protect small animals and birds from harm.

   c. Tge storage tanks - two, each 90 barrel capacity; steel-walled; contain unused premixed tge glycol and water.

d. Dga storage tank - 90 barrel capacity; steel-walled; mounted on stand 4' above grade; contains unused premixed diglycolamine and water.

e. Caustic storage tanks - two, each 350 barrel capacity; steel-walled; not in service as mercaptans are no longer removed from the gas stream; tanks are almost empty.

f. Oil storage tank - 1,500 gallon capacity; steel-walled; 8" concrete curb; gravel pad; contains unused Citgo NGL oil.

g. Diesel fuel storage tank - 500 gallon capacity; steel walled; mounted on stand 6' above grade; no pad; contains diesel fuel.

h. Methanol storage tank - 1,000 gallon capacity; steel-walled; contains methanol for use in thawing frozen pipes.

i. Corrosion inhibitor storage tank - 410 gallon capacity; fiberglass-walled; contains a pH controller ("Kontrol 430W"), which is introduced into the pipeline at the point the gas is received from the supplier, to coat the interior of the pipe and protect it from the corrosive effects of H_2S. Tank rests on a concrete pad with no berm.

j. Used oil sump - 150 barrel capacity; steel-walled with steel lid; buried; enclosed at surface by an 18-inch earthen berm to protect against rainwater intrusion. Used oil from engine crankcases, compressors, and filters is collected and drained manually into this sump. Oil is removed by EOTT as necessary to prevent overflows.

k. Other sumps - See discussion in Section II.B.6.

l. Other storage tanks and drums - potable water.

3. Underground plant or wastewater pipes, their age and specification (i.e., wall thickness, fabrication material), are:

a. All underground pipes are designed and constructed like Transwestern's transportation pipelines. They are made of coated steel and connected to the plant's rectifier system for corrosion control. They were installed 19 years ago when the plant was constructed, and they have not been replaced since. There is no record of leaks. Specifications are:

(1) Pipe from sump north of pump room to surface impoundment: 2" diameter; Schedule 80; .190" wall thickness.

(2) Pipe from engine room floor drain to surface impoundment: 6" diameter; Grade B Standard; .188" wall thickness.

b. Pipe delivering compressed air from the air compressor to the control room at 90 psi: 1" diameter; Grade B Standard; .188" wall thickness. No other buried pipes are pressurized.

D. Spill/Leak Prevention and Housekeeping Procedures

1. SPCC: Procedures addressing spill containment and cleanup from the processing units, including proposed schedule for OCD notification of spills, will be described in the plant's contingency plan (SPCC); this document is being prepared; a copy will be forwarded to OCD as soon as it is finalized. Information as to whether tanks and sumps are curbed or bermed is presented in Section II.C.2. Drains and sumps are discussed in Section II.B.6 and Section II.C.2.k. Final disposition of material is:

a. Pipeline liquids from pipeline liquids storage tank - hydrocarbon phase: Yates Petroleum Company, 105 S. Fourth St., Artesia, NM 88210.

b. Used oil from used oil sump, and material from the surface impoundment: Enron Oil Trading and Transportation Company, P.O. Box 2297, Midland, TX 79702; telephone (915) 687-0783. Used oil is hauled to Lubbock Waste Oil Company, Lubbock, Texas, and surface impoundment material is hauled to a salt water disposal well operated by I & W, and located about 14 miles east, and 2 miles south, of Artesia, New Mexico.

c. Cleaning rags, used filters and other solid waste: Waste Management of Southwest New Mexico, P.O. Box 15700, Rio Ranchero, NM 87174; telephone (505) 392-6571. Material is hauled to Eddy County Municipal Landfill, located in Carlsbad, New Mexico.

2. Housekeeping: Precipitation runoff is directed away from the plant facility. Cleanup of routine spills is addressed in Section II.A.6. Information on curbs and berms, drains, and disposition, are discussed in Sections II.C.2, II.B.6, and II.D.1, respectively.

3. Leak detection: There are no automated systems to detect leaks and ensure integrity of above-ground storage tanks, below-ground sumps, and buried pipes. Above-ground storage tanks are inspected weekly.

4. Injection wells: No injection wells, monitor wells, or potable water wells exist onsite.

III. EFFLUENT DISPOSAL

A. Existing Operations

1. Onsite Facilities.

   a. No onsite facilities exist for permanent disposal of produced water, sludges, waste oils, etc.

      (1) Surface impoundment: Surface impoundment is discussed in Section II.C.2.b.

      (2) Leach fields: A leach field is associated with the septic tank for treating sewage. The leach field consists of two 50'-long 4" perforated pipes.

      Sewage and plant wastes are not commingled. Onsite laboratory wastes were directed to the septic tank from 1971 to 1982. Since 1982, when the laboratory was closed, sludges have not been pumped from the septic tank.

      (3) Injection wells: See Section II.D.4.

      (4) Drying beds or other pits: A trash pit exists onsite; it is unlined and partially covered over. It was in service from 1971 to 1988. Trash is now removed from the site by Waste Management of Southwest New Mexico; see Section II.D.1.c.

      (5) Other onsite disposal (e.g., land application): Not applicable.

   b. For each of the disposal methods listed above:

      (1) Existing measures to prevent or retard seepage: The surface impoundment has a concrete liner.

      (2) Location and design of site(s) and method(s) available for sampling: No special provisions are needed to sample material in the surface impoundment.

      (3) Monitoring system: There is no monitoring system.

      (4) Periodic reporting: No periodic reporting is planned.

      (5) Proposed actions: In the event of failure of the surface impoundment or other containment systems, action specified in the SPCC would be taken, including reporting the event to OCD; see Section II.D.1.

(6) Future operations: Operation of the surface impoundment is not expected to be discontinued.

2. Offsite Disposal.

Offsite disposal of used oil and surface impoundment effluent is handled by EOTT as described in Section II.D.1.b.

B. Proposed Modifications

No modifications are planned.

IV. SITE CHARACTERISTICS

A. Hydrologic Features

1. Bodies of water: Rio Penasco; intermittent stream; 0.5 miles north; Pecos tributary.

18 wells within 1 mile.

7 water wells with windmills within 1 mile.

1 trash pit onsite.

1 pond onsite.

1 pond within 0.75 mile.

1 gravel pit/mine shaft, 1 mile southwest.

2. Depth and TDS of groundwater: Artesian aquifer - 155' depth (1975); 15 mg/l chloride (1978); 794-to-875 mg/l TDS (1962, Artesia city well, 9 miles north of site).

Shallow alluvial aquifer - 120' depth; 30 mg/l chloride (1978); 794-to-875 mg/l TDS (1962, Artesia city well, 9 miles north of site).

3. Groundwater flow direction: Artesian aquifer - east to southeast.

Shallow alluvial aquifer - east to southeast, except along the Rio Penasco, where water level declines have created a cone of depression, drawing flow to the north. (Reference: "Geohydrologic Framework of Roswell Basin," Technical Report 42, New Mexico State Engineer, Santa Fe, New Mexico, 1983.)

B. Geologic Description of Site

1. Soil types: Reagan Series (RA, RE) loam and light clay loam with a permeability of 0.8 to 2.5 inches per hour. Gravelly loam with a permeability of 0.8 to 10 inches per hour. Gypsum or soft caliche at 40 inches in depth.

2. Names of aquifers: Artesian - Shallow alluvial.

3. Composition: Artesian - San Andreas limestone (Psa) Queen and Greyburg formations (Pggb).

   Shallow alluvial - alluvium.

4. Depth to rock: Artesian - top of aquifer is about 420' deep; confining bed thickness is about 300'.

   Shallow alluvial - 170'; saturated thickness is 50'.

C. Flood Protection

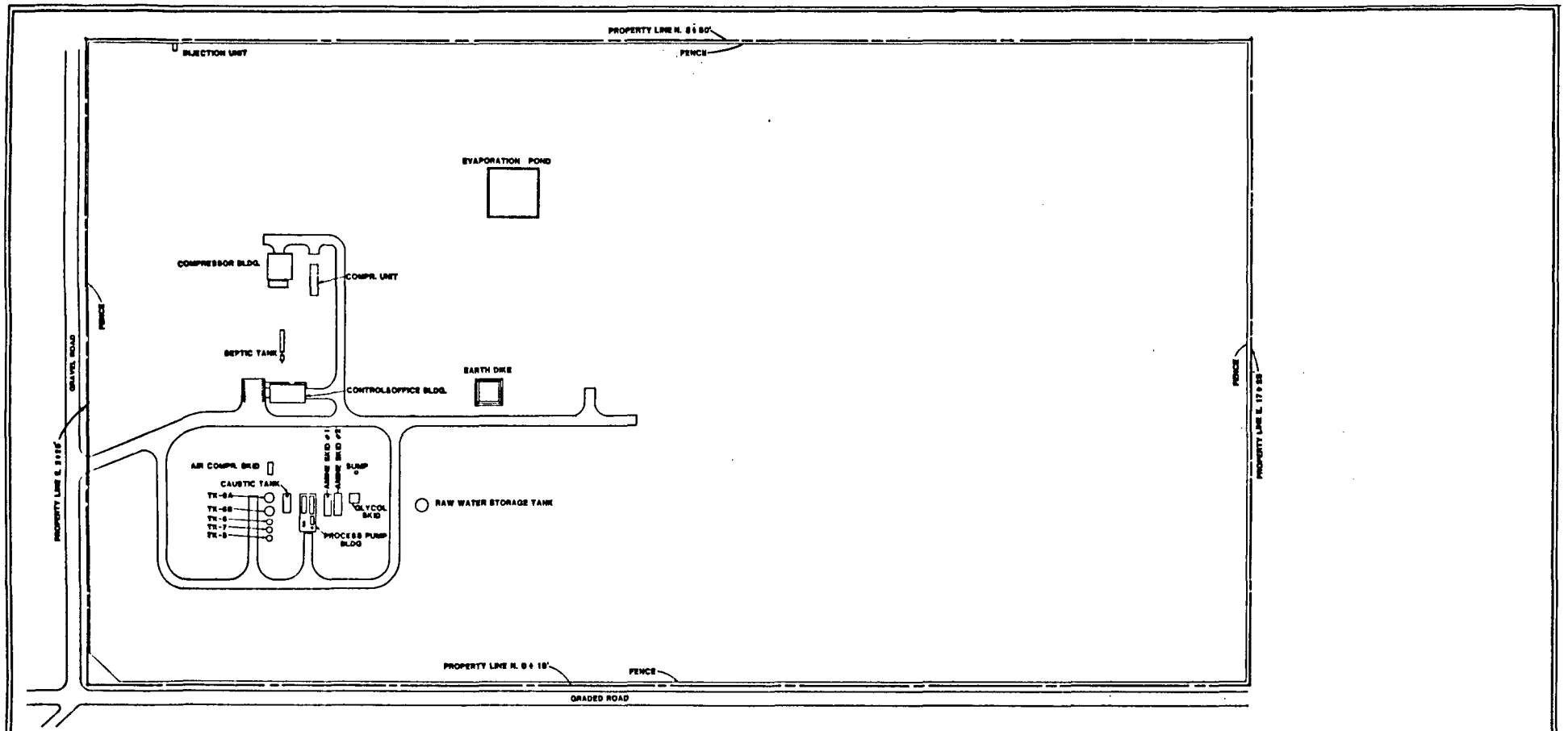
Provide information on:

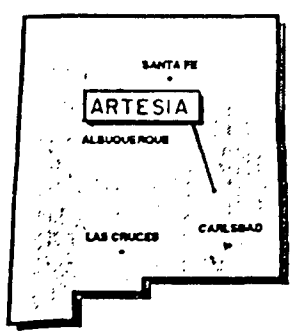
1. Flooding potential: No record of flooding onsite.

2. Flood protection: Curbs and berms are discussed in Section II.C.2.

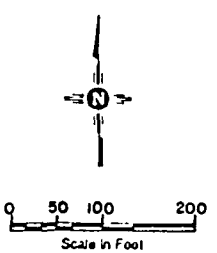
V. ADDITIONAL INFORMATION

To be provided as requested.





STATE OF NEW MEXICO



TRANSWESTERN PIPELINE COMPANY

YATES PLANT

EDDY COUNTY, NEW MEXICO

APPR.	DATE:
REV.	DATE:

CITGO Petroleum Corporation

GAS ENGINE OIL ANALYSIS SERVICE

ACCOUNT	ENRON CORP.	ENGINE ID	421302800
LOCATION	ROSWELL, NEW MEXICO	MAKE & MODEL	WAUK L7042
SITE	YATES COMPRESSOR STATION	OIL IN USE	CITGO NGL
ADDRESS	BOX 2018 ROSWELL, NM 88201	CUSTOMER ID	#800
PHONE NO.	505-623-8612	CONTACT	BILL NOLAN

SAMPLE ID	66- 60	38-183	8-216	340- 95	314- 3	278-180
DATE SAMPLED	03-01-90	02-01-90	01-02-90	12-01-89	11-01-89	10-02-89
DATE RECEIVED	03-07-90	02-07-90	01-08-90	12-06-89	11-10-89	10-05-89
DATE REPORTED	03-12-90	02-09-90	01-10-90	12-07-89	11-13-89	10-06-89
SERVICE HRS OIL	2207	1557	818	92	2460	1766
SERVICE HRS FILTER	2207	1557	818	92	2460	1766
OIL ADDED (GALLONS)	140	80	110	125	60	50
HRS LAST OVERHAUL	13038	12388	11649	10923	10208	9514
TOTAL ENGINE HRS	13119	131269	130530	129804	129089	128404

ANALYTICAL DATA

VISCOSITY (SUS @ 210°F)	76.2	73.6	73.7	71.6	73.1	75.0
INSOLUBLES (% WT)	0.07	0.05	0.06	0.05	0.05	0.05
IR (OXIDATION)	2	1	1	1	1	3 *
IR (NITRATION)	2	1	1	1	2	2
WATER	POS #	NEG	NEG	NEG	NEG	NEG

METALS (PPM)

FE	IRON	19	15	18	23	18	38 #
PB	LEAD	3	1	1	2	0	4
CU	COPPER	1	1	1	1	2	2
AL	ALUMINUM	1	1	1	1	2	2
CR	CHROMIUM	0	0	0	0	1	1
SI	SILICON	3	3	3	4	2	2
SN	TIN	0	0	0	0	0	0
NA	SODIUM	6	3	71 #	13	7	19
B	BORON	2	3	67 #	0	0	1

RECOMMENDATIONS

OIL	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
AIR FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
MAIN BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
ROD BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CAM BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
BUSHING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CRANKSHAFT	O.K.	O.K.	O.K.	O.K.	O.K.	[CK]
LINER	O.K.	O.K.	O.K.	O.K.	O.K.	[CK]
PISTONS	O.K.	O.K.	O.K.	O.K.	O.K.	[CK]
RINGS	O.K.	O.K.	O.K.	O.K.	O.K.	[CK]
COOLING SYSTEM	[CK]	O.K.	[CK]	O.K.	O.K.	O.K.
RESAMPLE DAYS	10	30	10	30	30	10

CITGO Petroleum Corporation
GAS ENGINE OIL ANALYSIS SERVICE

ACCOUNT	ENRON CORP.	ENGINE ID	421302892
LOCATION	ROSWELL, NEW MEXICO	MAKE & MODEL	WAUK 2895
SITE	YATES COMPRESSOR STATION	OIL IN USE	CITGO NGL
ADDRESS	BOX 2018 ROSWELL, NM 88201	CUSTOMER ID	ENG 892
PHONE NO.	505-623-8612	CONTACT	BILL NOLAN

SAMPLE ID	66- 62	38-184	8-219	340- 96	314- 7	278-181
DATE SAMPLED	03-01-90	02-01-90	01-02-90	12-01-89	11-01-89	10-02-89
DATE RECEIVED	03-07-90	02-07-90	01-08-90	12-06-89	11-10-89	10-05-89
DATE REPORTED	03-12-90	02-09-90	01-10-90	12-07-89	11-13-89	10-06-89
SERVICE HRS OIL	3044	2388	1645	928	210	1750
SERVICE HRS FILTER	3044	2388	1645	928	210	1750
OIL ADDED (GALLONS)	90	50	100	130	30	80
HRS LAST OVERHAUL	11702	11046	10303	9586	8868	8139
TOTAL ENGINE HRS	11702	11046	10303	9586	8868	8139
ANALYTICAL DATA						
VISCOSITY (SUS @ 210°F)	73.1	71.9	73.0	70.8	70.8	69.4
INSOLUBLES (% WT)	0.07	0.05	0.03	0.05	0.03	0.05
IR (OXIDATION)	1	1	1	1	1	1
IR (NITRATION)	1	1	1	1	1	1
WATER	NEG	NEG	NEG	NEG	NEG	NEG
METALS (PPM)						
FE IRON	9	11	11	5	3	9
PB LEAD	1	0	0	3	0	1
CU COPPER	1	1	1	1	1	2
AL ALUMINUM	0	1	1	1	1	1
CR CHROMIUM	0	0	0	0	1	1
SI SILICON	2	2	2	4	1	1
SN TIN	0	0	0	0	0	0
NA SODIUM	7	2	2	1	0	5
B BORON	1	2	0	0	0	0
RECOMMENDATIONS						
OIL	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
AIR FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
MAIN BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
ROD BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CAM BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
BUSHING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CRANKSHAFT	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
LINER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
PISTONS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
RINGS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
COOLING SYSTEM	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
RESAMPLE DAYS	30	30	30	30	30	30

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

DAYTON QUADRANGLE
NEW MEXICO–EDDY CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

5149 I SE (HOPE SE)

5149 IV SW (ARTESIA)

5149 IV SE (SPRING LA

5149 II NE (PARISH RANCH)

5149 III NE (LAKE MCMILLAN NORTH)

5149 III SW (SEVEN RIVERS)

5149 III SE (LAKE MCMILLAN SOUTH)

ROSWELL 51 MI.
ARTESIA 6.5 MI.

CARLSBAD 21 MI
PECOS, TEXAS 106 MI.

Dayton

Frontier Post

Rio Peñasco

Fourmile Draw

North Seven Rivers

ATCHISON TOPEKA AND SANTA FE

Taylor Ross Ranch

100 Ranch

T. 18 S.
T. 19 S.

R. 25 E.
R. 26 E.

104°30'
104°22'30"
32°45'
32°37'30"
42'30"
40'
27'30"
25'

480 000 FEET
450 000 FEET
630 000 FEET
600 000 FEET

3623000m N.
3610000m N.
558000m E.

Mapped, edited, and published by the Geological Survey

Control by USGS and USC&GS

Culture and drainage in part compiled from aerial photographs taken 1947. Topography by planetable surveys 1955

Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system, east zone

1000-meter Universal Transverse Mercator grid ticks, zone 13, shown in blue

Revisions shown in purple compiled from aerial photographs taken 1975. This information not field checked

UTM GRID AND 1975 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

1 MILE
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET
1 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

NEW MEXICO
QUADRANGLE LOCATION

ROAD CLASSIFICATION

Heavy-duty ——— Light-duty ———
Medium-duty ——— Unimproved dirt - - - -
U. S. Route ⬡ State Route

DAYTON, N. MEX.
N3237.5—W10422.5/7.5

1955
PHOTOREVISED 1975
AMS 5149 III NW – SERIES V881

ENRON
Gas Pipeline Operating Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

April 9, 1990

New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501

Attn: Mr. Roger Anderson
Environmental Engineer

Dear Mr. Anderson:

Discharge Plan GW-53 Application
Yates Plant
Transwestern Pipeline Company

This Discharge Plan Application for Yates Plant, located in Eddy County, New Mexico, is being submitted on behalf of Transwestern Pipeline Company. If you require additional information or clarification, please contact me at (713) 853-7303.

I. GENERAL INFORMATION

A. Discharger/Legally Responsible Party

Name: Transwestern Pipeline Company
Yates Plant
Attn: Omar Parker

Address: 2605 W. Main St., Artesia NM 88210

Telephone: (505) 457-2568

B. Local Representative or Contact Person

Same as above.

C. Location of Discharge

Legal Description: Southwest 1/4 Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico.

A USGS 7.5 minute quadrangle map and a plot plan showing location of discharge, plant equipment, and other site information required below, are attached.

Note: All onsite routine discharges are to sumps, above-ground tanks, or a concrete-lined surface impoundment, with subsequent transfer offsite by an appropriate disposal company. No onsite discharges are intentionally allowed to enter surface waters or groundwaters.

D. Type of Natural Gas Operation

This plant treats up to 7 MMscfd of natural gas from fields in southeastern New Mexico, removing pipeline liquids and H_2S, and provides compression for transportation in the Transwestern system. Plans call for increasing plant throughput to 10 MMscfd.

E. Copies

Three copies of the discharge plan application are enclosed.

F. Affirmation

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate, and complete to the best of my knowledge and belief.

Sincerely,

W. Alan Bowman

W. Alan Bowman
Project Environmentalist
Environmental Affairs Department

3 Copies

cc Bill Janacek, w/o USGS maps
Omar Parker, w/o USGS maps
Richard Jolly w/o USGS maps
Larry Campbell w/o USGS maps

OCD0328wab

II. PLANT FACILITIES

A. Sources and Quantities of Effluent and Plant Fluids
For each source, primary quality type (e.g., high TDS water, hydrocarbons, sewage), estimated quantities, and major additives, if any, are provided.

1. Processors: An inlet scrubber on each compressor removes a total of 10,900 barrels per year of pipeline liquids from the gas. These liquids are temporarily stored in an above-ground 210 barrel capacity pipeline liquids tank. The hydrocarbon phase of the liquid is removed periodically by Yates Petroleum Company and marketed, while the water is directed to a surface impoundment, where it evaporates. H_2S emissions from the tank vent are directed to a flare.

   A triethylene-glycol (teg) dehydrator removes water from the gas; the water in the form of water vapor is vented to the atmosphere. A teg reboiler is part of the system; no additives are used.

   A diglycolamine (dga) plant removes H_2S from the gas and directs it to a flare. A dga reboiler is part of the system; no additives are used.

2. Boilers: Not applicable.

3. Engine cooling water: A Waukesha Model 7042 and a Waukesha Model 2895, both 4-cycle internal combustion engines, drive compressors at the plant. The engines have separate closed-loop radiator systems, circulating a pre-mixed solution of Ambitrol glycol and water; no additives are used.

   Two small Ingersol Rand air compressors, which provide instrument air to the control room, have similar closed-loop radiator systems (i.e., use pre-mixed coolants, no additives).

   Any coolant removed for engine or compressor maintenance is stored and returned to the units. In the event that the coolant is changed out, the waste material will be removed from the site by an approved disposal company.

4. Cooling tower: Not applicable.

5. Sewage: Sewage is directed to an onsite septic tank and associated leach field. Until 1982, a sink drain from an onsite analytical laboratory, used to test glycol and amine, was also directed to the septic tank. As the laboratory is no longer in service, the septic system is now completely separate from other plant effluents, with no commingling.

6. Other: There are no cleaning operations using solvents, no truck washing, and no pesticides used at this plant. Rags and Alpha Blue Tiger soap are used for cleaning. Weeds are controlled by periodic spraying of herbicides by a third party - A-1 Weed Control Company, Hobbs, New Mexico.

   Floor drains are discussed in Section II.B.6.

   Materials stored and used onsite include: Citgo NGL oil, Marvel Mystery Oil, Mobil pump oil, methanol, pre-mixed Dow Ambitrol FL glycol and water, triethylene-glycol, diesel fuel, pre-mixed diglycolamine and water, Alpha Blue Tiger soap, and Kontrol 430W corrosion inhibitor.

B. Quality Characteristics

Characteristics of the individual waste streams are as follows.

1. Processors: Pipeline liquids are received at the plant as part of the gas stream. The hydrocarbon phase is a marketed product. The water phase is produced water; it may contain suspended solids, but it is exempt from hazardous waste regulations.

   Dga reboiler in the H_2S removal system contains diglycolamine and water. Chemical analysis is unavailable.

   Teg reboiler in the dehydration system contains triethylene-glycol and water. Chemical analysis is unavailable.

2. Boilers: Not applicable.

3. Engine cooling water: Coolant consists of a pre-mixed solution of Ambitrol glycol and water. Chemical analysis is unavailable.

4. Cooling tower: Not applicable.

5. Sewage: Not applicable.

6. Other: Herbicide used is "Krozar I"; it is administered by a contractor, and is not stored onsite.

   Used engine oil is temporarily stored onsite. It is routinely analysed for the purpose of determining when it needs to be changed out; a typical analysis is attached.

   A floor drain in one engine room (Waukesha 2895) collects oily waste water when oil is washed from the engine and compressor, and directs it to the surface impoundment. The other engine/compressor is skid-mounted an rests on a gravel pad; there is no drain.

Drain pipes in the amine plant pump room direct dga pump leakage to an outdoor sump south of the pump room. The liquid is directed back into the amine system - a closed-loop system. Pumps all have electric drivers, so there is no engine oil or coolant involved. Sump has a steel lid to prevent rainwater intrusion.

Other plant drains including those in the dehydration system area collect oily waste water and used teg, which are directed to an outdoor sump on the north side of the pump room, and from there it is directed to the surface impoundment where the water evaporates. Sump has a steel lid to prevent rainwater intrusion.

C. Transfer and Storage of Plant Fluids and Effluents

1. Water and wastewater flow schematics are not applicable because no individual water treatment units exist. Liquid wastes are not discharged onsite; they are stored temporarily and then transferred offsite.

2. Potential water contaminants, which may be discharged to the surface and subsurface within the plant, would be associated with sumps, above-ground storage tanks, the surface impoundment, and connecting underground pipes. Sumps, storage tanks and surface impoundment are inspected weekly. Tanks are mounted above-ground on steel I-beams or stands to facilitate inspection. There is no record of leaks; however, there is evidence onsite of minor spills, i.e., stained soil. At the present time, only two storage tanks are bermed or curbed, but plans call for berming all of them. Storage tanks, surface impoundment, and sumps consist of:

   a. Pipeline liquids tank - 210 barrel capacity, steel-walled; 2' earthen berm; contains pipeline liquids from inlet scrubbers; hydrocarbon phase is removed from site by Yates Petroleum Company; water phase is drained to surface impoundment, where it evaporates.

   b. Surface impoundment - 40 feet by 40 feet by 8-feet deep, concrete-lined; edge is about 8" above grade to prevent runon; contains liquids from sumps and water from the pipeline liquids tank; liquid is removed by Enron Oil Trading and Transportation Company (EOTT) as necessary to prevent overflowing. Impoundment is screened to protect small animals and birds from harm.

   c. Tge storage tanks - two, each 90 barrel capacity; steel-walled; contain unused premixed tge glycol and water.

d. Dga storage tank - 90 barrel capacity; steel-walled; mounted on stand 4' above grade; contains unused premixed diglycolamine and water.

e. Caustic storage tanks - two, each 350 barrel capacity; steel-walled; not in service as mercaptans are no longer removed from the gas stream; tanks are almost empty.

f. Oil storage tank - 1,500 gallon capacity; steel-walled; 8" concrete curb; gravel pad; contains unused Citgo NGL oil.

g. Diesel fuel storage tank - 500 gallon capacity; steel walled; mounted on stand 6' above grade; no pad; contains diesel fuel.

h. Methanol storage tank - 1,000 gallon capacity; steel-walled; contains methanol for use in thawing frozen pipes.

i. Corrosion inhibitor storage tank - 410 gallon capacity; fiberglass-walled; contains a pH controller ("Kontrol 430W"), which is introduced into the pipeline at the point the gas is received from the supplier, to coat the interior of the pipe and protect it from the corrosive effects of H_2S. Tank rests on a concrete pad with no berm.

j. Used oil sump - 150 barrel capacity; steel-walled with steel lid; buried; enclosed at surface by an 18-inch earthen berm to protect against rainwater intrusion. Used oil from engine crankcases, compressors, and filters is collected and drained manually into this sump. Oil is removed by EOTT as necessary to prevent overflows.

k. Other sumps - See discussion in Section II.B.6.

l. Other storage tanks and drums - potable water.

3. Underground plant or wastewater pipes, their age and specification (i.e., wall thickness, fabrication material), are:

a. All underground pipes are designed and constructed like Transwestern's transportation pipelines. They are made of coated steel and connected to the plant's rectifier system for corrosion control. They were installed 19 years ago when the plant was constructed, and they have not been replaced since. There is no record of leaks. Specifications are:

(1) Pipe from sump north of pump room to surface impoundment: 2" diameter; Schedule 80; .190" wall thickness.

(2) Pipe from engine room floor drain to surface impoundment: 6" diameter; Grade B Standard; .188" wall thickness.

b. Pipe delivering compressed air from the air compressor to the control room at 90 psi: 1" diameter; Grade B Standard; .188" wall thickness. No other buried pipes are pressurized.

D. Spill/Leak Prevention and Housekeeping Procedures

1. SPCC: Procedures addressing spill containment and cleanup from the processing units, including proposed schedule for OCD notification of spills, will be described in the plant's contingency plan (SPCC); this document is being prepared; a copy will be forwarded to OCD as soon as it is finalized. Information as to whether tanks and sumps are curbed or bermed is presented in Section II.C.2. Drains and sumps are discussed in Section II.B.6 and Section II.C.2.k. Final disposition of material is:

a. Pipeline liquids from pipeline liquids storage tank - hydrocarbon phase: Yates Petroleum Company, 105 S. Fourth St., Artesia, NM 88210.

b. Used oil from used oil sump, and material from the surface impoundment: Enron Oil Trading and Transportation Company, P.O. Box 2297, Midland, TX 79702; telephone (915) 687-0783. Used oil is hauled to Lubbock Waste Oil Company, Lubbock, Texas, and surface impoundment material is hauled to a salt water disposal well operated by I & W, and located about 14 miles east, and 2 miles south, of Artesia, New Mexico.

c. Cleaning rags, used filters and other solid waste: Waste Management of Southwest New Mexico, P.O. Box 15700, Rio Ranchero, NM 87174; telephone (505) 392-6571. Material is hauled to Eddy County Municipal Landfill, located in Carlsbad, New Mexico.

2. Housekeeping: Precipitation runoff is directed away from the plant facility. Cleanup of routine spills is addressed in Section II.A.6. Information on curbs and berms, drains, and disposition, are discussed in Sections II.C.2, II.B.6, and II.D.1, respectively.

3. Leak detection: There are no automated systems to detect leaks and ensure integrity of above-ground storage tanks, below-ground sumps, and buried pipes. Above-ground storage tanks are inspected weekly.

4. Injection wells: No injection wells, monitor wells, or potable water wells exist onsite.

III. EFFLUENT DISPOSAL

A. Existing Operations

1. Onsite Facilities.

a. No onsite facilities exist for permanent disposal of produced water, sludges, waste oils, etc.

(1) Surface impoundment: Surface impoundment is discussed in Section II.C.2.b.

(2) Leach fields: A leach field is associated with the septic tank for treating sewage. The leach field consists of two 50'-long 4" perforated pipes.

Sewage and plant wastes are not commingled. Onsite laboratory wastes were directed to the septic tank from 1971 to 1982. Since 1982, when the laboratory was closed, sludges have not been pumped from the septic tank.

(3) Injection wells: See Section II.D.4.

(4) Drying beds or other pits: A trash pit exists onsite; it is unlined and partially covered over. It was in service from 1971 to 1988. Trash is now removed from the site by Waste Management of Southwest New Mexico; see Section II.D.1.c.

(5) Other onsite disposal (e.g., land application): Not applicable.

b. For each of the disposal methods listed above:

(1) Existing measures to prevent or retard seepage: The surface impoundment has a concrete liner.

(2) Location and design of site(s) and method(s) available for sampling: No special provisions are needed to sample material in the surface impoundment.

(3) Monitoring system: There is no monitoring system.

(4) Periodic reporting: No periodic reporting is planned.

(5) Proposed actions: In the event of failure of the surface impoundment or other containment systems, action specified in the SPCC would be taken, including reporting the event to OCD; see Section II.D.1.

(6) Future operations: Operation of the surface impoundment is not expected to be discontinued.

2. Offsite Disposal.

Offsite disposal of used oil and surface impoundment effluent is handled by EOTT as described in Section II.D.1.b.

B. Proposed Modifications

No modifications are planned.

IV. SITE CHARACTERISTICS

A. Hydrologic Features

1. Bodies of water: Rio Penasco; intermittent stream; 0.5 miles north; Pecos tributary.

18 wells within 1 mile.

7 water wells with windmills within 1 mile.

1 trash pit onsite.

1 pond onsite.

1 pond within 0.75 mile.

1 gravel pit/mine shaft, 1 mile southwest.

2. Depth and TDS of groundwater: Artesian aquifer - 155' depth (1975); 15 mg/l chloride (1978); 794-to-875 mg/l TDS (1962, Artesia city well, 9 miles north of site).

Shallow alluvial aquifer - 120' depth; 30 mg/l chloride (1978); 794-to-875 mg/l TDS (1962, Artesia city well, 9 miles north of site).

3. Groundwater flow direction: Artesian aquifer - east to southeast.

Shallow alluvial aquifer - east to southeast, except along the Rio Penasco, where water level declines have created a cone of depression, drawing flow to the north. (Reference: "Geohydrologic Framework of Roswell Basin," Technical Report 42, New Mexico State Engineer, Santa Fe, New Mexico, 1983.)

B. Geologic Description of Site

1. Soil types: Reagan Series (RA, RE) loam and light clay loam with a permeability of 0.8 to 2.5 inches per hour. Gravelly loam with a permeability of 0.8 to 10 inches per hour. Gypsum or soft caliche at 40 inches in depth.

2. Names of aquifers: Artesian - Shallow alluvial.

3. Composition: Artesian - San Andreas limestone (Psa) Queen and Greyburg formations (Pggb).

   Shallow alluvial - alluvium.

4. Depth to rock: Artesian - top of aquifer is about 420' deep; confining bed thickness is about 300'.

   Shallow alluvial - 170'; saturated thickness is 50'.

C. Flood Protection

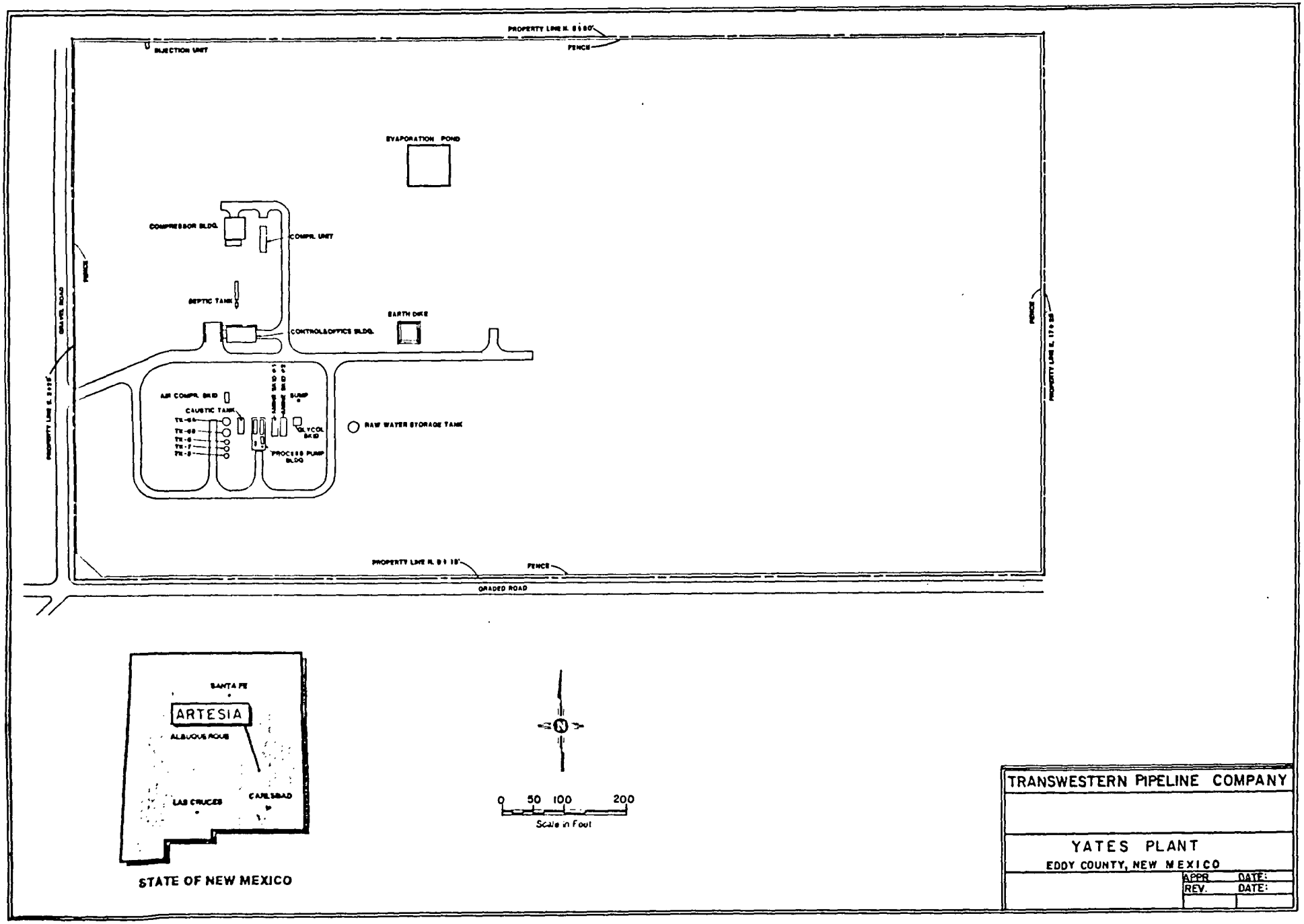
Provide information on:

1. Flooding potential: No record of flooding onsite.

2. Flood protection: Curbs and berms are discussed in Section II.C.2.

V. ADDITIONAL INFORMATION

To be provided as requested.


PROPERTY LINE N. 0°00'
FENCE
INJECTION UNIT
EVAPORATION POND
COMPRESSOR BLDG.
COMPR. UNIT
SEPTIC TANK
EARTH DIKE
CONTROL&OFFICE BLDG.
GRAVEL ROAD
FENCE
AIR COMPR. SKID
CAUSTIC TANK
SUMP
GLYCOL SKID
RAW WATER STORAGE TANK
PROCESS PUMP BLDG.
PROPERTY LINE N. 0°00'
FENCE
GRADED ROAD
SANTA FE
ARTESIA
ALBUQUERQUE
LAS CRUCES
CARLSBAD
STATE OF NEW MEXICO
N
0 50 100 200
Scale in Feet
TRANSWESTERN PIPELINE COMPANY
YATES PLANT
EDDY COUNTY, NEW MEXICO
APPR. DATE:
REV. DATE:

CITGO Petroleum Corporation

GAS ENGINE OIL ANALYSIS SERVICE

ACCOUNT	ENRON CORP.	ENGINE ID	421302800
LOCATION	ROSWELL, NEW MEXICO	MAKE & MODEL	WAUK L7042
SITE	YATES COMPRESSOR STATION	OIL IN USE	CITGO NGL
ADDRESS	BOX 2018 ROSWELL, NM 88201	CUSTOMER ID	#800
PHONE NO.	505-623-8612	CONTACT	BILL NOLAN

SAMPLE ID	66- 60	38-183	8-216	340- 95	314- 3	278-180
DATE SAMPLED	03-01-90	02-01-90	01-02-90	12-01-89	11-01-89	10-02-89
DATE RECEIVED	03-07-90	02-07-90	01-08-90	12-06-89	11-10-89	10-05-89
DATE REPORTED	03-12-90	02-09-90	01-10-90	12-07-89	11-13-89	10-06-89
SERVICE HRS OIL	2207	1557	818	92	2460	1766
SERVICE HRS FILTER	2207	1557	818	92	2460	1766
OIL ADDED (GALLONS)	140	80	110	125	60	50
HRS LAST OVERHAUL	13038	12388	11649	10923	10208	9514
TOTAL ENGINE HRS	13119	131269	130530	129804	129089	128404
ANALYTICAL DATA						
VISCOSITY (SUS @ 210°F)	76.2	73.6	73.7	71.6	73.1	75.0
INSOLUBLES (% WT)	0.07	0.05	0.06	0.05	0.05	0.05
IR (OXIDATION)	2	1	1	1	1	3 *
IR (NITRATION)	2	1	1	1	2	2
WATER	POS #	NEG	NEG	NEG	NEG	NEG
METALS (PPM)						
FE IRON	19	15	18	23	18	38 #
PB LEAD	3	1	1	2	0	4
CU COPPER	1	1	1	1	2	2
AL ALUMINUM	1	1	1	1	2	2
CR CHROMIUM	0	0	0	0	1	1
SI SILICON	3	3	3	4	2	2
SN TIN	0	0	0	0	0	0
NA SODIUM	6	3	71 #	13	7	19
B BORON	2	3	67 #	0	0	1
RECOMMENDATIONS						
OIL	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
AIR FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
MAIN BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
ROD BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CAM BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
BUSHING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CRANKSHAFT	O.K.	O.K.	O.K.	O.K.	O.K.	[CK]
LINER	O.K.	O.K.	O.K.	O.K.	O.K.	[CK]
PISTONS	O.K.	O.K.	O.K.	O.K.	O.K.	[CK]
RINGS	O.K.	O.K.	O.K.	O.K.	O.K.	[CK]
COOLING SYSTEM	[CK]	O.K.	[CK]	O.K.	O.K.	O.K.
RESAMPLE DAYS	10	30	10	30	30	10

CITGO Petroleum Corporation

GAS ENGINE OIL ANALYSIS SERVICE

ACCOUNT	ENRON CORP.	ENGINE ID	421302892
LOCATION	ROSWELL, NEW MEXICO	MAKE & MODEL	WAUK 2895
SITE	YATES COMPRESSOR STATION	OIL IN USE	CITGO NGL
ADDRESS	BOX 2018 ROSWELL, NM 88201	CUSTOMER ID	ENG 892
PHONE NO.	505-623-8612	CONTACT	BILL NOLAN

SAMPLE ID	66- 62	38-184	8-219	340- 96	314- 7	278-181
DATE SAMPLED	03-01-90	02-01-90	01-02-90	12-01-89	11-01-89	10-02-89
DATE RECEIVED	03-07-90	02-07-90	01-08-90	12-06-89	11-10-89	10-05-89
DATE REPORTED	03-12-90	02-09-90	01-10-90	12-07-89	11-13-89	10-06-89
SERVICE HRS OIL	3044	2388	1645	928	210	1750
SERVICE HRS FILTER	3044	2388	1645	928	210	1750
OIL ADDED (GALLONS)	90	50	100	130	30	80
HRS LAST OVERHAUL	11702	11046	10303	9586	8868	8139
TOTAL ENGINE HRS	11702	11046	10303	9586	8868	8139
ANALYTICAL DATA						
VISCOSITY (SUS @ 210°F)	73.1	71.9	73.0	70.8	70.8	69.4
INSOLUBLES (% WT)	0.07	0.05	0.03	0.05	0.03	0.05
IR (OXIDATION)	1	1	1	1	1	1
IR (NITRATION)	1	1	1	1	1	1
WATER	NEG	NEG	NEG	NEG	NEG	NEG
METALS (PPM)						
FE IRON	9	11	11	5	3	9
PB LEAD	1	0	0	3	0	1
CU COPPER	1	1	1	1	1	2
AL ALUMINUM	0	1	1	1	1	1
CR CHROMIUM	0	0	0	0	1	1
SI SILICON	2	2	2	4	1	1
SN TIN	0	0	0	0	0	0
NA SODIUM	7	2	2	1	0	5
B BORON	1	2	0	0	0	0
RECOMMENDATIONS						
OIL	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
AIR FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
MAIN BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
ROD BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CAM BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
BUSHING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CRANKSHAFT	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
LINER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
PISTONS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
RINGS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
COOLING SYSTEM	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
RESAMPLE DAYS	30	30	30	30	30	30

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

December 8, 1989

CERTIFIED MAIL
RETURN RECEIPT NO. P-106-675-198

Mr. William G. Janacek, Director
Environmental Affairs
ENRON GAS PIPELINE OPERATING CO.
P. O. Box 1188
Houston, Texas 77251-1188

RE: Discharge Plan GW-53
Yates Compressor Station
Eddy County, New Mexico

Dear Mr. Janacek:

Under the provisions of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for your existing Yates Compressor Station located in Section 25, Township 18 South, Range 25 East, (NMPM), Eddy County, New Mexico.

This notification of discharge plan requirement is pursuant to Sections 3-104 and 3-106 of the WQCC Regulations. The discharge plan, defined in Section 1.101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the plant site or adjacent to the plant site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in buried underground tanks and/or piping), and closure plans for any ponds whose use will be discontinued.

A copy of the regulations is enclosed for your convenience. Also enclosed is a copy of an OCD guide to the preparation of discharge plans for gas processing plants. The guidelines are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Please include these items in your renewal application. Three copies of your discharge plan should be submitted for review purposes.

Section 3-106.A. of the regulations requires a submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this time period is sought and approved for good cause. Section 3-106.A also allows the discharge to continue without an approved discharge plan until 240 days after written notification by the Director of the OCD that a discharge plan is required. An extension of this time may be sought and approved for good cause.

If there are any questions on this matter, please feel free to call David Boyer at 827-5812, or Roger Anderson at 827-5884 as they have the assigned responsibility for review of all discharge plans.

Sincerely,

William J. LeMay
Director

WJL/RCA/sl

cc: OCD Artesia Office